

## ARGUMENTS

### Rejection of Claims on Art Grounds in the 05/13/2004 Office Action, and Traversal Thereof

In the 05/13/2004 Office Action, claims 1-225 were rejected on prior art grounds, under 35 U.S.C. 102(b) as being anticipated by Template Software's product line.

Applicant asserts that the prior art reference cited by the examiner does not anticipate the claims. Furthermore, the number of claims has been greatly reduced in order to more distinctly state the scope of the present invention. The above rejections of the claims 1-225 on the stated art grounds are traversed, and consideration of the patentability of the claims 1-249, now amended or cancelled, is requested, in light of the foregoing amendments and the following remarks.

The examiner referenced Using the SNAP Development Environment, SNAP version 8.0, Second Edition (**SNAP**) to represent Template Software's product line. **SNAP** teaches an object model editor that allows a user to create links between classes or remove a link between classes, which are displayed in an object model editor workspace. The links represent a form of interface. By contrast, the software development tool of the present invention as claimed comprises a method that displays dependencies between graphically represented nodes. Importantly, as defined by the present application a node can be a class, an interface, or a package. A package is a collection of attributes, notifications, operations, or behaviors treated as a single module or program unit. There is no indication that **SNAP** graphically represents either interfaces or packages as nodes that can have dependency links with other nodes. Furthermore, the present application claims a method for displaying links that already exist between two or more nodes, rather

than a method for defining or creating those links. **SNAP** is applicable to a programmer who is creating or removing dependencies among several classes. In the present invention, the dependency links serve to inform a programmer who may make changes to a given node of relationships among the nodes wherein a change to one node will result in a change in another node.

The examiner stated that **SNAP** supports a plurality of dependencies. The examiner further noted that **SNAP** supports a class representing multiple links. These dependencies and links as displayed in the reference (**SNAP**, page 3-14; and **SNAP**, page 3-15) are among several classes, wherein between two classes there may be only one dependency. The present invention requires that for a dependency link to be displayed between two nodes there must be multiple dependencies between those two nodes.

The examiner states that one of ordinary skill in the art should know messaging inherent in object technology is also a form of interface. The examiner further points out that the **SNAP** environment provides for error messages when rules in the object model editor have been violated. While this may be true, **SNAP** still does not graphically represent either interfaces or packages as nodes that can have dependency links with other nodes.

## CONCLUSION

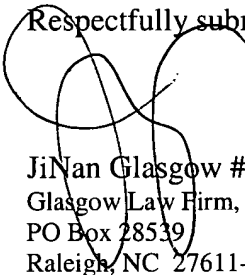
In view of the foregoing, claims 1-249, now amended or cancelled, constituting the claims pending in the application, are submitted to be fully patentable and in allowable condition to address and overcome the rejections.

If any issues remain outstanding, incident to the allowance of the application, Examiner Ingberg is respectfully requested to contact the undersigned attorney at (919)-

664-8222 or via email at [jingang@trianglepatents.com](mailto:jingang@trianglepatents.com) to discuss the resolution of such issues, in order that prosecution of the application may be concluded favorably to the applicant, consistent with the applicant's making of a substantial advance in the art and particularly pointing out and distinctly claiming the subject matter that the applicant regards as the invention.

This Office Action response is submitted via USPS Express Mail on August 12, 2004.

Respectfully submitted,



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